

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

PATIENT CARE ASSOCIATES, LLC.;  
a/s/o/ O.L.,

Plaintiff(s),

-v-

BRISTOL-MYERS SQUIBB COMPANY; ABC CORP. (1-10) (Said names being fictitious and unknown entities),

Defendant(s).

Civil Action No.: 2:13-cv-02460-SRC-CLW

**APPLICATION FOR EXTENSION  
OF TIME TO ANSWER, MOVE OR  
OTHERWISE REPLY PURSUANT  
TO LOCAL CIVIL RULE 6.1(b)**

**Document Electronically Filed**

Application is hereby made for a Clerk's Order, pursuant to Local Civil Rule 6.1(b), extending the time within which Defendant Bristol-Myers Squibb Company ("Defendant") must answer, move, or otherwise reply to the Complaint filed by Plaintiff Patient Care Associates, LLC ("Plaintiff"), by fourteen (14) days, until May 7, 2013; and it is represented that:

1. Plaintiff's Complaint was mailed by the Clerk of the Superior Court of New Jersey, Law Division, Special Civil Part, Bergen County on March 14, 2013, and received by Defendant on March 18, 2013.

2. The parties stipulated to extend the time within which Defendant may Answer with respect to the Complaint to May 22, 2013.

3. On April 16, 2013, Defendant filed a Notice of Removal in this Court.

4. Under Rule 81(c)(2) of the Federal Rules of Civil Procedure, Defendant's time to answer, move or otherwise reply to Plaintiff's Complaint currently expires on April 23, 2013.

5. Pursuant to Local Civil Rule 6.1(b), Defendant hereby requests a fourteen-day extension of time, through May 7, 2013, to answer, move, or otherwise reply to Plaintiff's Complaint.

6. This is Defendant's first request for an extension of time to respond to Plaintiff's Complaint in this Court.

Respectfully Submitted,

Dated: April 23, 2013

By: s/ David M. Wissert  
David M. Wissert  
**LOWENSTEIN SANDER LLP**  
65 Livingston Avenue  
Roseland, New Jersey 07068  
973.597.2500  
973.597.2400 (facsimile)  
*Attorneys for Defendant*  
*Bristol-Myers Squibb Company*

**LOCAL RULE 6.1(b) CLERK'S ORDER GRANTING AN EXTENSION OF TIME**

**IT IS**, on this \_\_\_\_\_ day of April, 2013 hereby

**ORDERED** that the Local Rule 6.1(b) Application of Defendant Bristol-Myers Squibb Company for an extension of time to answer, move or otherwise respond to the Complaint be and hereby is **GRANTED**.

**IT IS FURTHER ORDERED** that pursuant to Local Rule 6.1(b), the time within which Defendant may answer, move or otherwise respond to the Complaint is extended for a period of fourteen (14) days from April 23, 2013 to **May 7, 2013**.

WILLIAM T. WALSH, Clerk

By: \_\_\_\_\_  
Deputy Clerk

**CERTIFICATION OF SERVICE**

I, DAVID M. WISSERT, being of full age, hereby certify pursuant to 28 U.S.C. § 1746 that I am a member of the Bar of this Court and a partner of the law firm of Lowenstein Sandler LLP, attorneys for Defendant in the above-captioned matter, and that a true and correct copy of Defendant's Application For Extension Of Time To Answer, Move Or Otherwise Reply Pursuant To Local Civil Rule 6.1(b) was, on this date, April 19, 2013, filed with the Court and served via ECF on counsel for Plaintiff, Andrew R. Bronsnick, Esq.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: April 23, 2013

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